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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

| | | |
|---------------------------------|---|----------------------------|
| CHAD BURTON HILL and LOUISA |) | |
| BISSETTE, |) | CV-23-34-BU-DWM |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | PLAINTIFFS' INITIAL |
| |) | DISCLOSURE |
| PAUL BURT, TED CALDWELL, FLYING |) | |
| J RANCH, LLP, DAVID WENDT, |) | |
| BEAVERHEAD COUNTY, and DOES 1- |) | |
| 10, |) | |
| |) | |
| Defendants. |) | |

**I. INDIVIDUALS WITH DISCOVERABLE INFORMATION
WHOM PLAINTIFFS MAY USE TO SUPPORT THEIR CLAIMS**

1. Chad Hill, plaintiff
2. Louisa Bissette, plaintiff
3. Paul Burt, defendant
4. Ted Caldwell, defendant

5. David Wendt, defendant
6. Deputy Haggard, Beaverhead County Sheriff's Department
7. Deputy Bowman, Beaverhead County Sheriff's Department
8. Deputy Stewart, Beaverhead County Sheriff's Department
9. Angie Dansie, Blue Ribbon Botanicals
10. Bill Briggs, Wendt's business partner
11. Mike Lilly, mediator of Flying J lawsuit
12. Lee Salmonson, tenant at Dell property
13. Joe Richard, previous owner of Dell property
14. Rich Bowman and Cindy Bowman, neighbors of Dell property
15. Linda Cochran, neighbor of Dell property
16. Devin Keller, Montana MMP
17. Richard Reyes, electrician

II. DESCRIPTION OF DOCUMENTS AND TANGIBLE THINGS IN PLAINTIFFS' POSSESSION THAT THEY MAY USE TO SUPPORT THEIR CLAIMS

Plaintiffs' business records.

III. COMPUTATION OF DAMAGES

Damages have not yet been completely assessed, but include loss of income, loss of opportunity, and emotional distress.

IV. INSURANCE AGREEMENTS

Plaintiffs believe MACo and Flying J Defendants have applicable insurance coverage.

Dated this 8th day of March, 2024.

/s/Timothy M. Bechtold
BECHTOLD LAW FIRM

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing on March 8, 2024 via email attachment upon the following:

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s/ Timothy M. Bechtold
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